

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In Re Royal Bank of Scotland Group plc
Securities Litigation

)
) 09 Civ. 300 (DAB)
)
) ECF Case
)
) Oral Argument Requested

**THE ROYAL BANK OF SCOTLAND GROUP PLC'S AND THE INDIVIDUAL
DEFENDANTS' NOTICE OF MOTIONS TO DISMISS THE AMENDED COMPLAINT**

PLEASE TAKE NOTICE that, pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6), upon the Memoranda of Law in Support, and the accompanying Appendices, Declarations, and Exhibits, and upon all prior proceedings and papers filed herein, Defendant The Royal Bank of Scotland Group plc ("RBS") and the Individual Defendants, by its undersigned counsel, will move this Court before the Honorable Deborah A. Batts, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 24B, New York, New York, at a time and date convenient for the Court, for an order (a) dismissing all claims for failure to state a claim upon which relief can be granted; (b) dismissing all claims against the Individual Defendants for lack of personal jurisdiction; (c) dismissing all claims against RBS under the *forum non conveniens* doctrine; and (d) granting such other relief as this Court may deem just and proper.

Dated: June 1, 2011

Respectfully submitted,

/s/ Paul A. Engelmayer

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